

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUMAN RIGHTS DEFENSE CENTER, a
Washington nonprofit corporation,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
JUSTICE; and its component, DRUG
ENFORCEMENT ADMINISTRATION,

Defendants.

Case No. 2:20-cv-00674-JHC

**PARTIES' STIPULATED MOTION TO
EXTEND FILING DEADLINE FOR
PLAINTIFF'S MOTION FOR FEES AND
COSTS & ORDER**

STIPULATED MOTION

Pursuant to Local Civil Rule 7(j) and 10(g), Plaintiff Human Rights Defense Center ("Plaintiff") and Defendants Department of Justice and Drug Enforcement Administration (collectively, "Defendants") move the Court for an order extending the time by which Plaintiff must file its motion for attorneys' fees and costs. Specifically, the Parties request an additional 60-day extension of the F.R.C.P. 54(d)(2)(B)(i) deadline as follows:

Deadline	Current Date	Revised Date
Motion for Fees and Costs	June 24, 2024	August 23, 2024

Thus far, Plaintiff submitted a settlement offer on June 14, 2024, which Defendants are still reviewing. Therefore, there is good cause to extend this deadline because the parties

are still currently negotiating a potential resolution and settlement, which if successful, would obviate the need for expenditure of further litigant and judicial resources. Good cause also exists because there is no prejudice towards any party. Accordingly, the Parties respectfully request the Court grant this Motion.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

I certify that this paper contains 151 words, in compliance with Local Civil Rule 7(e)(1).

DATED this 17th day of June, 2024.

TESSA M. GORMAN
United States Attorney

DAVIS WRIGHT TREMAINE LLP

By s/ Kyle Forsyth
KYLE FORSYTH, WSBA #34609
Assistant United States Attorney
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Tel: 206-553-7970
Fax: 206-553-2422
Email: kyle.forsyth@usdoj.gov

By s/ Caesar Kalinowski IV
Eric M. Stahl, WSBA #27619
Caesar Kalinowski IV, WSBA #52650
DAVIS WRIGHT TREMAINE LLP
920 Fifth Avenue, Suite 3300
Seattle, WA 98104
Tel: 206-622-3150
Fax: 206-757-7700

Attorney for Federal Defendants

Email: ericstahl@dwt.com
caesarkalinowski@dwt.com

EJ Hurst, Admitted *Pro Hac Vice*
HUMAN RIGHTS DEFENSE CENTER
P.O. Box 1151
Lake Worth, FL 33460
Telephone: 561-360-2523
Email: ejhurst@humanrightsdefensecenter.org

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

Dated this 17th day of June, 2024.



JOHN H. CHUN

United States District Judge